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Plaintiff Sayers Construction, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA, For
the Use of Benefit of SOURCE
HELICOPTERS, DIVISION OF
ROGERS HELICOPTERS, INC., a
California corporation,

Plaintiff,

vs.

SAYERS CONSTRUCTION, LLC, a
Texas limited liability company
PHILADELPHIA INDEMNITY
INSURANCE COMPANY, a
PENNSYLVANIA corporation; and
DOES I-V and ROE CORPORATIONS I-
V,

Defendants.

Case No.: 2:19-cv-1602-JCM-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR *JOINT*
PRETRIAL ORDER
(Second Request)**

1 Use-Plaintiff, Source Helicopters, Division of Rogers Helicopters, Inc. (“Plaintiff” or
 2 “Rogers”), and Defendants, Sayers Construction, LLC (“Sayers”) and Philadelphia Indemnity
 3 Insurance Company (“PIIC”), by and through their attorneys, hereby stipulate and request the Court
 4 extend the parties’ deadline to file the Joint Pretrial Order. In support of this stipulation and request,
 5 the following is provided, pursuant to LR IA 6-1:
 6

7 The deadline for filing the Joint Pretrial Order in this action is currently set for Wednesday,
 8 May 11, 2022. On April 11, 2022, the parties filed a stipulation to extend the pretrial order deadline
 9 from April 13, 2022, to May 11, 2022 [Dkt. #94], which the Court granted [Dkt. #95]. On the same
 10 day, Philadelphia filed its Motion for Reconsideration and Clarification of the Court’s Order on the
 11 parties’ cross motions for summary judgment [Dkt. #93]. Rogers filed its response to Philadelphia’s
 12 Motion for Reconsideration on April 25, 2022 [Dkt. #96], and the deadline for Philadelphia’s reply is
 13 May 2, 2022.
 14

15 On April 25, 2022, Rogers filed its own Motion for Reconsideration and for Clarification of
 16 the Court’s Order [Dkt. #97]. Sayers’s deadline to respond to Rogers’s Motion for Reconsideration is
 17 May 9, 2022.
 18

19 The briefing schedule for these motions for reconsideration have and will take away time from
 20 the adequate preparation of the Joint Pretrial Order. Moreover, the Court’s decisions on the motions
 21 for reconsideration could greatly alter the scope of the issues to be addressed in the Joint Pretrial Order.
 22

23 In consideration of the above, the parties submit good cause is present for their request for an
 24 extension of the current deadline for the Joint Pretrial Order. The parties propose the current May 11,
 25 2022 deadline for filing the Joint Pretrial Order shall be extended to **twenty-one (21) days following**
 26 **the Court’s decision on Rogers’s and Philadelphia’s motions for reconsideration.**¹
 27

28 ¹ If the Court submits separate rulings on the motions for reconsideration on different days, the
 deadline for filing the Joint Pretrial Order will be twenty-one days following the latter ruling.

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LLC**Dated: May 2, 2022****THE FAUX LAW GROUP**By /s/ Kurt C. Faux

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Dated: May 2, 2022**IT IS SO ORDERED:**

U.S. MAGISTRATE JUDGE
DATED: May 3, 2022